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STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

XXXXXXXXXXXXXXX GORDON E. GUYER, Director
David F. Hales, Director

August 30, 1988

Mr. David Canosa
J.E. Berger Corporation
5300 Bellevue
Detroit, Michigan 48211

Dear Mr. Canosa:

On August 24, 1988, I conducted a joint final inspection of your property and adjacent areas to determine your company's compliance with all previous directives to cleanup and remove for proper disposal all identified Polychlorinated Biphenyl (PCB) contaminated areas and items. On this date I verified the final cleanup activities conducted by your firm since my last visit as follows:

1. Completion of the cleaning and repaving of the alley between Kirby, Canton, Frederick and Concord Streets.

2. Completion of the excavation of contaminated soils of concern in Lot 3.

3. The removal of contaminated blocks, soil, asphalt and debris of concern from Lot 2.

4. The removal of approximately 660 gallons of PCB water collected from previously cleaning out storm drains in the vicinity of your property.

5. Removal of 1 pallet and 2 drums of PCB capacitors.

This inspection, in conjunction with all our previous inspections, indicates that all the types of PCB contamination originally discussed in Andrew Hogarth's September 19, 1986 letter (attached) have been addressed by your firm. Briefly, these include the following:

a.) Sediment and debris along curbs.
b.) Asphalt and concrete contamination.
c.) Catch basins.
d.) Alley near Lot 3 (previously described).
e.) Loading docks.
f.) Right-of-way areas (between curb and sidewalk).
g.) Residential yards.
h.) Stored drums and tanks.

September 19, 1986

Mr. David Canosa
J.E. Berger Corporation
5300 Bellevue
Detroit, Michigan

Dear Mr. Canosa:

This is in response to a letter to me from your company's consultant, Bennett Engineering, dated August 11, 1986, concerning the PCB environmental problem on and in the vicinity of your facility, located at 5300 Bellevue in Detroit. The work proposed by your consultant in his letter was based upon information available as of August 11, 1986. Since that time, additional sampling has documented the need to extend the area of street sediment and debris cleaning. The additional streets where sediment and debris removal is required, along with several additional categories of PCB off-site contamination that will also require clean-up, are identified in the attached "Frederick Street PCB Site--Detroit, Cleanup Work Plan" and accompanying map. In brief, this cleanup work plan directs your company to remediate through cleanup activities the following types of off-site PCB contamination identified to date.

a. Sediment and debris along curbs.
b. Asphalt and concrete contamination.
c. Catch basins.
d. Unpaved soil sections of alley.
e. Loading docks (additional testing is required in these areas).
f. Right-of-way areas (between curb and sidewalk).
g. Residential yards.

This letter only addresses off-site contamination. Since some additional sampling will be necessary on-site in Lot #1, Lot #2, Lot #3 and your building, sufficient information does not exist to adequately design a cleanup program for on-site contaminated areas at this time. Therefore, you are directed to continue your sampling effort in these areas. Brian Monroe and Richard Taszreak of my staff will assist your consultant in identifying where additional data is necessary. Mr. Monroe can be contacted at 517-373-6808 or Mr. Taszreak can be reached at 517-373-8248.

In order to track your company's progress in cleaning up the off-site areas of contamination and to assure prompt cleanup, the Department of Natural Resources is requiring that you complete cleanup activities in accordance with all of the following deadlines:

FREDERICK STREET PCB SITE - DETROIT
CLEANUP WORK PLAN

I Introduction

The Frederick Street PCB site was discovered after a July 7, 1986, Toxic Substance Control Act (TSCA) inspection was made of the J.E. Berger Corporation facility by Michigan Department of Natural Resources' (MDNR) staff. This facility is located at 5300 Bellevue in Detroit and rebuilds large industrial motors and electrical control panels. During the July 7, 1986, inspection, several soil samples were collected on-site, and one sample was collected in a public alley adjacent to one of the three company owned fenced storage yards. This alley sample was analyzed and results showing 340,000 ppm PCB were transmitted to Phil Schrantz of the Hazardous Waste Division on the afternoon of Friday, July 18, 1986. MDNR and EPA staff contacted J.E. Berger Corporation officials on that same date and directed them to immediately control the area around this PCB hot spot with snow fencing and twenty-four hour security guards. The company took these actions. Company and MDNR staff have together taken well over 200 environmental and waste samples since the initial TSCA inspection and subsequent discovery of high PCB levels off the plant property. These samples (approximately one-half collected by MDNR staff) are to help define the full extent of on-site and off-site environmental contamination in the vicinity of the initial PCB hot spot, and to further identify PCB source areas.

II Definition of the Extent of Contamination

Determining the extent of contamination has meant sampling J.E. Berger Corporation property, and surrounding residential and street areas. To date, sampling of J.E. Berger Corporation property has yielded the following general results and conclusions:

1. Building and Loading Dock - Loading dock and entrance areas have shown PCB levels as high as 210 ppm. To date, no samples inside the J.E. Berger Corporation building have been collected. However, based on the loading dock and entrance area results, such sampling is necessary to determine if the building could be a contamination source area.

2. Storage Lots #1, #2 and #3 (see attached map) - Levels as high as 50,000 ppm PCB have been detected in Lot #3, as high as 55,000 ppm PCB in Lot #2, and as high as 290 ppm PCB in Lot #1. Approximately 40-50 samples of soils have been collected by MDNR staff in the storage areas. Additional samples have been collected by J.E. Berger staff.

3. Stored Drums and Tanks of PCB and/or Non-PCB Wastes - Numerous samples of drums and tanks have been collected by J.E. Berger. Additional samples have been collected by MDNR staff. These drums and tanks have now been relocated inside the J.E. Berger Corporation facility. Sample results have indicated that the drums contain low levels of PCB oils.

a. Sediment and Debris Along Curb - All sediment curbside debris in the street and alley areas identified on the attached map will be removed by the company utilizing the High Efficiency Particulate Air (HEPA) filter vacuum method described in the August 11, 1986, letter from the company's consultant, Bennett Engineering. Alternate cleanup methods may be necessary if this is not successful. All waste materials generated in this operation will be disposed of in accordance with all state and federal laws.

b. Asphalt and Concrete Contamination - The concrete portion of the alley between Kirby, Frederick, Concord, and Canton Streets will need to be cleaned to remove soil and then resampled. Depending on results, this alley may need to be cleaned with appropriate wash solution and then paved over, or scarified (milled) and paved. The resulting volume of contaminated material (solids and liquids) will be contained and disposed of in accordance with all federal and state laws. Concord Street will be cleaned with appropriate wash solution from its intersection with Frederick Street to a location 100 feet north. Canton Street will be cleaned with appropriate wash solution from its intersection with Frederick Street to a location 100 feet north, and also from the same intersection to a location 100 feet south. Disposal of all wash solutions will be in accordance with all federal and state laws. Frederick Street between Concord and Canton Streets will need to be cleaned with appropriate wash solution or scarified (milled) prior to repaving. Verification of cleanup effectiveness by sampling will be needed prior to repaving areas. (Note: All plans for working in the streets and alleys (vacuuming, washing, scarifying (milling) and repaving must be specifically approved by the City of Detroit and be in accordance with all directives from the appropriate City of Detroit agencies.)

c. Catch Basins - All catch basins in the street and alley sections that are designated for cleaning of sediment and debris will also be cleaned using vacuum methods, or other techniques acceptable to MDNR staff. (See IIIa above and the attached map.) All waste materials will be dispoed of as in IIIa above.

d. Unpaved Soil Sections of Alley - These will be excavated and removed for proper disposal in accordance with all federal and state laws. Post excavation resampling will be used to determine adequacy of excavation. The unpaved soil sections are located in the alley between Kirby, Frederick, Concord, and Canton Streets.

e. Loading Docks - The loading dock areas of the J.E. Berger building will be vacuumed and cleaned with appropriate wash solution. The loading dock areas will be resampled for adequacy of cleanup. Depending on results, the loading dock area(s) may need to be paved over or scarified (milled) and paved over.

IV Air Monitoring Requirements

Air monitoring must be conducted to demonstrate to the satisfaction of MDNR staff that cleanup operations are not creating unacceptable air emissions.